

Washed Hand and Crushed Stone
P. O. Box 418 Ephrata, Pa.

Herbert Cachs, Director
Water Resources Administration
Tawes State Office Bldg.
Annapolis, Md. 21401

Attn: Mr. Joseph P. Lewandowski, Chief, Enforcement Division

Dear Mr. Lewandowski:

Re: Supplemental Order C-O-75-120-A

This letter is to comply with section 3 of the subject order in terms agreed to in the meeting with members T.J. Hogan and Bill Yanovitch of your administration on May 21, 1975.

Section 3

(a) Exact location of buried chemical wastes on the subject property

The buried chemical waste is contained in 90 drums, more or less, located in a group distributed over an area about 60 feet in diameter and at a depth of about 5 feet below the surface.

These drums are located 1090 feet due east of the small stream running into the haulroad pond and then into the settling pond. As to their North-South orientation, they are in the small valley immediately south of the upper waste water disposal ponds.

(b) Retrieval of a representative portion of the buried wastes satisfactory to the administration

Of the 90 drums total, about 80 contain solidified block calcium chloride, caustic soda, wood, and paper trash. These were open head drums.

The other 10 drums contain semi-solid but pumpable bottoms type polymer waste containing residual lacquer solvent. These drums were closed.

Three representative drums have been exposed for inspection ones containing the lacquer residue and the other two containing the solid material.

(c) Evaluation of the effects of buried wastes on the quality of waters of the state.

Tests have been made on the muddy clay and stone fill dirt surrounding the buried drums and on the surface water above the burial site.

No odor is evident in the fill material and no abnormal COD

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a) Have been observed in the surface water as of this date.
Proposed sediment control measures approved by the Cecil Soil
Conservation District and Cecil County

(e) This requirement waived by Water Resources Administration
because the location of the drums is precisely known.

(e) Background information and treatment measures proposed for
control of the chemical pollution of surface and groundwater.

Two alternatives appear open for consideration-retrieval of all
drums and disposal elsewhere, or containment of the drum contents
in their present location.

For the reasons agreed on at the meeting, containment appears to be
the preferred method of control. These reasons were:

- (1) An attempt to retrieve all drums would result in bursting
the 9 drums containing semi-solid lacquer residue,
because large earth moving equipment would be necessary.
- (2) The remaining 72 drums were open ended and if any con-
tamination were capable of being released it would have
already occurred.

It was proposed and approved at the meeting that containment
be accomplished by the following technique:
A ditch 12 feet deep, penetrating wide (a bulldozer blade width) and 10-12 feet
long connecting the two clay hills immediately north and south
of the disposal site. This arc will be west of the drums—that is, at the
encircling the western (downslope) side of the burial site.
The top surface over the drum burial site will be domed to
discourage collection of rainwater in the vicinity.

Schedule for Implementation

The schedule is dependent on there being reasonable intervals of
time without rainfall, but the following should surely be possible:

- (1) Retrieval of drums for examination of contents-within 5 days
after notification by the Water Resources Administration
that they are needed.
- (2) Installation of containment dike-completion by July 19, 1975

Yours truly,
Lester R. Summers, President

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